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CITY OF CONCORD, OFFICER O'BRIEN, OFFICER  
DONNELLY, OFFICER GOLVINEAUX, SERGEANT  
ELSBERRY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ALANY JEAN HELMANTOLER, T.H.,  
K.H., and M.H., minors, through their  
guardian ad litem ALANY JEAN  
HELMANTOLER,

Plaintiffs,

vs.

CITY OF CONCORD, OFFICER  
O'BRIEN, OFFICER DONNELLY,  
OFFICER GOLVINEAUX, SERGEANT  
ELSBERRY, and DOES 1-10,

Defendants.

Case No. CV 14-02855 VC

**STIPULATION AND ~~PROPOSED~~  
ORDER CONTINUING CASE  
MANAGEMENT DEADLINES**

Trial Judge: Hon. Vince Chhabria

Trial Date: June 29, 2015

Action Filed: June 20, 2014

IT IS HEREBY STIPULATED AND AGREED, by and between the parties to this action,  
through their respective counsel of record, as follows:

WHEREAS this civil rights action is currently pending in the above entitled Court and has  
case management deadlines as set forth in the Court's Minute Entry of September 24, 2014 (ECF  
Doc. 24), dates set at the Case Management Conference of September 23, 2014.

WHEREAS the parties performed some key discovery prior to mediation and then  
recently attended mediation on January 15, 2015, which was not successful. Other discovery now  
needs to be completed and there is insufficient time for the parties to do so prior to the current

1 deadline of February 13, 2015, for expert disclosure and March 6, 2015, for the fact discovery  
 2 cut-off. In addition, the parties want to move back expert disclosure and expert discovery  
 3 deadlines in this case.

4 WHEREAS the parties have met and conferred and have agreed to the following  
 5 modifications to the current deadlines in this case as follows:

<u>Description</u>	<u>Current Deadline</u>	<u>New Deadline</u>
Expert Disclosure	February 13, 2015	March 6, 2015
Rebuttal Expert Disclosure	February 23, 2015	March 16, 2015
Fact Discovery Cut Off	March 6, 2015	March 20, 2015
Expert Discovery Cut Off	March 20, 2015	April 24, 2015

11 WHEREAS none of these new proposed dates will modify the deadline to file dispositive  
 12 motions (April 2, 2015), the Final Pretrial Conference (June 16, 2015) or the Trial Date (June 29,  
 13 2015) set in this matter.

14 WHEREAS good cause exists to reset these case management deadlines per the parties'  
 15 agreement.

16 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.  
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Dated: January 27, 2015

LAW OFFICES OF JOHN F. MARTIN

By: /s/ Marta R. Vanegas

John F. Martin  
Marta R. Vanegas  
Attorneys for Plaintiffs  
ALANY JEAN HELMANTOLER, T.H., K.H., and  
M.H., minors, through their guardian ad litem ALANY  
JEAN HELMANTOLER

Dated: January 27, 2015

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By: /s/ Noah G. Blechman

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DONNELLY, OFFICER GOLVINEAUX,  
SERGEANT ELSBERRY

**ORDER**

**PURSUANT TO STIPULATION, THE PARTIES NEW PROPOSED DEADLINES  
ARE AS FOLLOWS:**

<b><u>Description</u></b>	<b><u>New Deadline</u></b>
Expert Disclosure	March 6, 2015
Rebuttal Expert Disclosure	March 16, 2015
Fact Discovery Cut Off	March 20, 2015
Expert Discovery Cut Off	April 24, 2015

**ALL OTHER RELEVANT DEADLINES SHALL REMAIN IN EFFECT.**

**IT IS SO ORDERED**

Dated: February 2, 2015

By: 

Hon. Vince Chhabria  
U.S. District Court Judge